

ETEXT ATTACHMENT

06/18/2003 12:11

June 17, 2003

Scott Walker

Senior Campaign Finance Analyst

Federal Election Commission

999 E Street, N.W.

Washington D.C. 20463

RE: Request for Additional Information

NEA Fund for Children and Public Education

Committee ID# C00003251

2002 Pre-General Report

Dear Mr. Walker:

This letter responds to the Commission's letter dated May 15, 2003, regarding the NEA Fund for Children and Public Education's (the NEA Fund) 2002 Pre-General Report. The Commission's letter raised two issues: first, the letter suggested that the NEA Fund may have failed to allocate expenditures between its federal and non-federal account pursuant to the requirements of 11 C.F.R. 106.6. The apparent origin of this suggestion was the fact that the NEA Fund's 2002 pre-general report disclosed a transfer from the federal account to the NEA Fund's non-federal account in the amount of \$800,000.

The transfer in question was made solely to fund non-federal activity in support of state and local candidates. Accordingly, the NEA Fund was not required to file a report of allocated expenditures pursuant to §106.6. Henceforth, the NEA Fund will disclose on the purpose statement for a transfer to its non-federal account that the transfer was made for the purpose of funding non-federal activity.

The second matter addressed by the Commission's letter concerned a contribution made to the Friends of Sherwood Boehlert Committee on October 10, 2002, designated for debt retirement for the 2002 primary. The Commission's letter states that the committee did not have a primary debt at the time the NEA Fund made its contribution. In response to the Commission's letter, the NEA Fund has written to the Friends of Sherwood Buehlert Committee notifying the Committee of the Commission's determination and requesting that the Committee either provide the NEA Fund with documentation establishing that the Committee did in fact have a primary debt as of the date of the NEA Fund's October 10, 2002, contribution or refund the NEA Fund's \$3000 contribution to the NEA Fund. As soon as the Fund receives a response from the Boehlert Committee, we will notify the Commission of that response either by disclosing a refund of the contribution to the Boehlert Committee or by forwarding documentation of the primary debt to the Commission.

Please let us know if you need any additional information concerning this matter.

Sincerely,

Fred Suman,

Asst. Treasurer,

NEA Fund for Children

and Public Education